

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

ASR 2401 Fountainview, LP, debtor in the above-captioned bankruptcy case, hereby files its Expedited Motion for Order Authorizing Joint Administration of their cases under FED. R. BANKR. P. 1015(b)(4) (“Rule 1015(b)”), and shows the Court as follows:

I.
JURISDICTION AND VENUE

1. This Court has jurisdiction over this case and this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the standing order of reference of the United States District Court for the Northern District of Texas. This is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A) and (M). Venue is proper in this Court under 28 U.S.C. §§ 1408 and 1409.

II.
ARGUMENT AND AUTHORITY

2. On September 30, 2014, ASR 2401 Fountainview, LP (“LP”) filed a voluntary petition under chapter 11 of Title 11 of the United States Code (the “Code”), initiating Case No. 14-35322.

3. Also on September 30, 2014, ASR 2401 Fountainview, LLC (“LLC”) filed a voluntary petition under chapter 11 of Title 11 of Code, initiating Case No. 14-35323.

4. LP owns and operates an office building located at 2401 Fountainview, Houston, Texas 77057. LLC is the general partner of LP. LLC has no operations other than acting as the general partner of LP. Moreover, as general partner of the limited partnership, LLC is liable for any debts owed by LP. Since the two entities are so intertwined, it is appropriate and necessary, in order to avoid costly, duplicate proceedings and to save attorney time, court time, and the attendant costs of duplicate matters in each case, that the LLC and LP's cases be jointly administered and be treated as a single case for administrative purposes pursuant to Rule 1015(b).

5. According to Federal Rule of Bankruptcy Procedure 1015, the primary considerations to be weighed by the Court when considering joint administration are (1) protecting creditors of different estates against potential conflicts of interest; and (2) avoiding unnecessary costs and delays. Here, as mentioned above, the creditors of LP are also the creditors of LLC, and LLC has no operations independent from LP. Further, the undersigned counsel is unaware of potential conflicts of interest between LLC and LP that would potentially harm creditors. Finally, joint administration will save substantial costs and delays, which will serve the interests of both estates and their creditors, and will in turn foster the most expeditious and economical administration of the estates.

III. EXPEDITED RELIEF SOUGHT

Given that the debtors are a single entity, joint administration will save substantial costs and avoid delays, which, in turn, will serve the interests of the debtor's estate and creditors and foster the most expeditious and economical administration of the estates. As such, expedited relief is requested.

WHEREFORE, PREMISES CONSIDERED ASR 2401 Fountainview, LP respectfully requests that the Court approve its Motion for Order Authorizing Joint Administration and authorize:

- i. use of a single docket for administrative matters, including a listing of claims filed, and the filing, lodging and docketing of pleadings and orders;
- ii. the combining of notices to creditors and parties in interest;
- iii. the scheduling of hearings;
- iv. combined financial reporting by LLC and LP;
- v. the joint and several liability of the estates for administrative expenses; and
- vi. the joint handling of other administrative matters.

Dated: October 1, 2014

Respectfully submitted,

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